

REMARKS

This Amendment is in response to an Interview with the Examiner and his Primary on November 14, 2006 and in response to a non-final Office action (Paper No. 5) mailed July 31, 2006. Upon entry of this amendment, claims 16-30 will be pending. Applicant has amended claims 19 and 25 through 27 by this amendment and has newly added claims 28 through 30 by this amendment.

In Paper No. 05 mailed July 31, 2006, the Examiner objected to claims 25 through 27. Applicant has amended claims 25 through 27 by this amendment to overcome this objection.

In Paper No. 5, the Examiner has repeated the prior art rejections of the previous Office action (Paper No. 3) mailed March 28, 2005. In addition, on Pages 19 and 20 of Paper No. 5, the Examiner responded to Applicant's June 28, 2005 traversal of the prior art rejections of claims 16-19. At the Interview on November 14, 2006, the Examiner also disputed that Widergen does not teach transparent transmission of calls by indicating that Widergen, in case 5 and in other places, recites the word "transparently". Applicant will now respond to these Examiner's comments on Pages 19 and 20 of Paper No. 5, and in section 1b below, will explain why Widergen does not teach transparent transmission of a call origination message despite the use of the word "transparently" in Widergen.

1a. Transparency of call feature (Definition).

In each of Applicant's claims 16-19, Applicant claims "transmitting transparently a call origination message to one of said plurality of public mobile communication network BSCs ..." Applicant then argued that none of the applied prior art references, including Wildergen and Lu, teaches such transparent transmission. On Page 20 of Paper No. 5, the Examiner disagreed. Then, the Examiner requested clarification as to what "transparent" means. The Examiner indicated that the use of "transparent" in the specification and the claims had no value as its meaning was not defined in Applicant's specification. Applicant will now provide said clarification.

Applicant submits that "transparency" in telecom context is a term well known in the art to mean, "1. The property of an entity that allows another entity to pass thorough it without altering either of the entities. 2. In telecommunications, the property that allows a transmission system or channel to accept, at its input, unmodified user information, and deliver corresponding user information at its output, unchanged in form or information content. Note: The user information may be changed internally within the transmission system, but it is restored to its original form prior to the output without the involvement of the user". This definition can be found, for example, in Federal Standard 1037C which is a glossary of telecommunication terms. Because it is a term well known in the art, and because it is standardized, Applicant submits that it need not and should not be further defined by Applicant. MPEP 2173.02 and 2173.05 (a) state that a term in a claim is clear

and precise if the meaning of the term is apparent from the prior art or from those skilled in the art. Applicant submits that that threshold has been met, especially when the definition of “transparency” along with “transparent network” and “transparent interface” is clearly defined in a federal standard and is viewable at www.its.bldrdoc.gov/fs-1037 while being discussed in paragraph 0029 of Applicant’s specification.

At the November 14, 2006 interview, the Examiner asserted that the word “transparent” is ambiguous and this can not be given any meaning in the claims because Applicant has not defined it. It is Applicant’s position that the word “transparent”, especially in a telecommunications context, is a word with a standardized meaning to those of skill in the telecommunications art. Because it has a standardized meaning, Applicant submits that as per the MPEP that Applicant need not and should not have to define this word again in the claims and the specification as its meaning is very clear.

1b. Applied prior art fails to teach transparency feature

Applicant claims in each of claims 16 through 19 that the call origination message is transparently transmitted from the public/private communication service unit 12 to the public mobile communication network’s BSC 4-m. Applicant submits that Widergen fails to teach this. At the Interview on November 14, 2006, the Examiner disagreed because the Examiner contended that the description of case 5 at col 9, line 49 of Widergen mentions the word “transparently”. Applicant disagrees. Applicant submits

that this instance of the word “transparently” in Widergen pertains to the transfer of a dialed number, not a call origination message as claimed by Applicant. Applicant further submits that Widergen teaches that the call origination message is not transferred transparently in col 5, lines 7 through 12 where it says that the call origination message is converted from the CMT into a message according to the MSC to MSC signaling, and then the converted message is transmitted. Applicant submits that converting to MSC to MSC signaling means that the call origination message is not transmitted transparently in Widergen as asserted by the Examiner at the November 14, 2006 interview.

In summary, col 5, lines 49-53 and col 9, line 39 to col 10, line 1 (i.e., explanation of case 5) of Widergen teach that a call from a CMT located in a wireless office system 142 to a PMT is completed through the following routes, a RAN 126 to WO gateway 124 to PTN 108 to PSTN 104 to GMSC 136 and to MSC 112. Further, col 2, lines 33 to 37 and FIG. 1 of Widergen teach that a WO gateway 142 of the wireless office system 142 is connected to an MSC 112 of public cellular system 140 via an interface C, and col 5, lines 7 to 12 of Widergen teach that the signaling between the WO gateway 124 and the MSC 112 follows the MSC to MSC signaling. Therefore, from case 5 of Widergen in col 9, lines 48 to 50, Widergen only teaches transparently transmitting a dialed number to the PTN 108, and Widergen does not teach transparently transmitting a call origination message. Instead, Widergen teaches converting the call origination message from the CMT into a message according to the MSC to MSC signaling, and transmitting the

converted message.

Contrary to the teachings of Widergen, Applicant's invention teaches connecting a public/private communication service unit to a public mobile communication network's BSC. As seen in Applicant's FIG. 2, pBSC 40 of the public/private communication service unit 12 is connected to a BSC 4-m of a PLMN, and also, a call origination message from an MS is transmitted from the pBSC 40 to the BSC 4-m. As a result, the call origination message from the MS (i.e., a message according to the mobile communication signaling) disclosed in Applicant's invention is not converted into a message according to the MSC to MSC signaling as in Widergen, but is transparently transmitted to the BSC 4-m. For this reason, Widergen does not teach transparent transmission of a call origination message as claimed by Applicant.

Regarding the Lu reference, the BSC of Lu et al plays a role of an interface between a MSC and a BTS. However, in Lu et al, cPBX operates as the BSC belonging to a public network element and the MSC belonging to a private network element according to a type of a call, causing the call message to be changed. In Applicant's invention, a public/private communication service unit connected to the BSC of the PLMN plays a role of transparently transmitting a call to the PLMN according to the type of the call or performs the private mobile communication network service. Accordingly, Lu et al is different from Applicant's invention of providing a private mobile communication

network service by transparently transmitting a call to the PLMN according to a type of a call or by operating as private network element, without being changed according to the type of the call.

For origination of a call from the private mobile communication network to the public mobile communication network (PLMN), the cPBX of Lu et al operates as the BSC of the PLMN and transmits a call to a MSC of the PLMN resulting in a change to the message, but a public/private communication service unit of the present invention transmits transparently a call to the BSC of the PLMN. Unlike Lu et al, the public/private communication service unit of the present invention plays a role of transmitting a corresponding call to the public network, not one element of the PLMN. Because Lu transmits the call to the MSC of the PLMN, the call is changed and it is therefore not transparent.

2. Public/Private Common Cell feature

In claims 16-19, Applicant claims a public/private common cell area. Applicant has argued that Widergen does not teach this because private area 142 of Widergen is shown separate from public cell 140. On Page 19 of Paper No. 5, the Examiner disagreed and stated that reference numeral 142 of Widergen provides both public and private service and that private cells in general overlap public cells. Applicant disagrees.

Applicant submits that Widergen teaches roaming between private and public cell areas. Applicant submits that roaming need not occur if the public network extended into all areas. Furthermore, Col 6, lines 29-30 of Widergen state that CMTs of private cell 142 can roam in public cell 140. Applicant submits that this is evidence that the public cell 140 of Widergen does not extend throughout the private cell 142 as alleged by the Examiner. Further, FIG. 1 of Widergen shows cells 140 and 142 separated from each other and not coextensive. Therefore, Applicant submits that Widergen does not teach a public/private common area.

3. Use of Call Origination Message

In Applicant's claimed invention, the call origination message dictates whether the call is sent to the public mobile or the private mobile network. In Applicant's invention, the private network call and the public network call is determined according to a call origination message transmitted from a terminal and not the HLR/VLR. In contrast, col. 15, lines 50-54 of LU teach that it is by consultation with a VLR within pMSC as to whether the call is routed through the public or private cellular network.

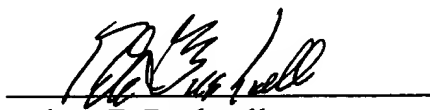
Newly added claims

Applicant has newly added claims 28 and 29 by this amendment to emphasize that the call is sent to the public or private network based on the call origination message transmitted from the MS and not by consulting an HLR or a VLR as in Lu.

In view of the above, it is submitted that the claims of this application are in condition for allowance, and early issuance thereof is solicited. Should any questions remain unresolved, the Examiner is requested to telephone Applicant's attorney.

A fee of \$1,020.00 for large entity is incurred by filing of a petition for a three month extension of time, set to expire on 30 January 2007. Applicant's check drawn to the order of Commissioner accompanies this Amendment. Should the check become lost, be deficient in payment, or should other fees be incurred, the Commissioner is authorized to charge Deposit Account No. 02-4943 of Applicant's undersigned attorney in the amount of such fees.

Respectfully submitted,



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